

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

June 7, 2022

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

RE: United States v. Michael Avenatti,
19 Cr. 374 (JMF)

Dear Judge Furman:

We write to respectfully request that the Court modify Michael Avenatti's Judgment to reflect a designation recommendation to the low-security satellite camp adjacent to FCI Sheridan, rather than to the medium-security federal correctional institution recommended in the current judgment. Dkt. No. 442 at 2.

During the sentencing proceedings in the above-captioned case on June 2, 2022, counsel for Michael Avenatti requested that the Court recommend to the Bureau of Prisons that Mr. Avenatti be designated to "FPC Sheridan, which is in Oregon, and closer to his family and residence." Sentencing Tr. at 57:4-6. Undersigned counsel understood that FPC Sheridan is the proper title for the low-security camp located adjacent to FCI Sheridan. Consistent with that understanding (and with the Court's acknowledgement of our request for a designation recommendation), we respectfully ask that the Court amend page two of Mr. Avenatti's judgment, strike the recommendation to FCI Sheridan, and instead recommend a designation "to FPC Sheridan, the low-security satellite camp adjacent to FCI Sheridan."

Respectfully Submitted,

/s/
Robert M. Baum
Tamara L. Giwa
Andrew J. Dalack
Assistant Federal Defenders

Cc: Government Counsel

Counsel for Michael Avenatti